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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 **-oOo-**

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 DELVIN WARD, A/K/A "D-LUV";
22 ANTHONY MABRY, A/K/A "AK" AND
23 "AKIM SLIM";
24 MARKETTE TILLMAN, A/K/A "KETTY P";
25 DEMICHAEL BURKS, A/K/A "MIKEY P";
26 JACOREY TAYLOR, A/K/A "MO-B";
27 FRED JAMES NIX, A/K/A "JUNE P";
28 SEBASTIAN WIGG, A/K/A "ROCK";
29 REGINALD DUNLAP, A/K/A "BOWLIE";
30 STEVEN BOOTH, A/K/A "STEVIE-P";
31 TERRENCE THOMAS, A/K/A "SEVEN" AND
32 "SEVEN A";
33 Defendants.
34 . . .

35) SEALED
36) 2:08-cr- 283
37) CRIMINAL INDICTMENT
38)
39) **VIOLATIONS:**
40) 18 U.S.C. § 1962(d): Conspiracy to
41) Engage in a Racketeer Influenced
42) Corrupt Organization
43) 18 U.S.C. § 1959: Violent Crime in Aid of
44) Racketeering
45) 18 U.S.C. §§ 924(c) and (j): Use of
46) Firearm during a Crime of Violence
47) 21 U.S.C. § 846: Conspiracy to Engage
48) in Drug Trafficking
49) 21 U.S.C. § 841(a)(1)(iii): Possession
50) with Intent to Distribute a Controlled
51) Substance
52) 18 U.S.C. § 2 - Aiding and Abetting
53)

1 THE SPECIAL GRAND JURY CHARGES THAT:

2 **COUNT ONE**
3 RICO CONSPIRACY
4 THE ENTERPRISE

5 1. At all times relevant to this Indictment the Defendants, **DELVIN WARD**,
6 **A/K/A, "D-LUV"; ANTHONY MABRY, A/K/A "AK" AND "AKIM SLIM"; MARKETTE**
7 **TILLMAN, A/K/A "KETTY P"; DEMICHAEL BURKS, A/K/A "MIKEY P"; JACOREY**
8 **TAYLOR, A/K/A "MO-B"; FRED JAMES NIX, A/K/A "JUNE P"; SEBASTIAN WIGG, A/K/A**
9 **"ROCK"; REGINALD DUNLAP, A/K/A "BOWLIE"; STEVEN BOOTH, A/K/A "STEVIE-P";**
10 **and TERRENCE THOMAS, A/K/A "SEVEN" AND "SEVEN A"; and others known and**
11 **unknown to the Special Grand Jury, have been members and associates of the Playboy**
12 **Bloods, a criminal organization whose members engage in acts of violence, including acts**
13 **involving murder, extortion, robbery and dealing in controlled substances. Members and**
14 **associates of the Playboy Bloods operate within and about the metropolitan area of Las**
15 **Vegas, Nevada.**

16 2. The Playboy Bloods, including its leadership, members, and associates,
17 constitutes an enterprise within the meaning of Title 18, United States Code, Section
18 1961(4); that is, a group of individuals associated in fact, although not a legal entity. The
19 enterprise constitutes an ongoing organization whose members function as a continuing unit
20 for a common purpose of achieving the objectives of the enterprise. The enterprise is
engaged in, and its activities affect, interstate commerce.

21 **GENERAL BACKGROUND AND STRUCTURE**

22 3. The Bloods is a nationally known criminal street organization whose
23 members engage in drug trafficking and acts of violence. The Playboy Bloods are a local
24 "set" or affiliate of the Bloods, with local control and operation within the Las Vegas, Nevada,
25 metropolitan area. Other Bloods sets within the Las Vegas metropolitan area are Pirus and

1 West Coast Bloods. A subset of the Playboy Bloods is Full Throttle Clique, a group made
2 up of Playboy Bloods' members who engage in acts of violence, including murder.

3 4. The Playboy Bloods operate primarily in a housing complex (Sherman
4 Gardens Annex) at H and Doolittle, commonly called the "Jets." Playboy Bloods are
5 involved in murder, attempt murder, robberies and drug trafficking.

6 5. The Playboy Bloods' colors are red and black. The Playboy Bloods'
7 symbol is the Playboy bunny. Members use monikers or street names to avoid detection
8 by law enforcement. The monikers typically end in P or B (e.g. Ketty-P, Mo-B). The Playboy
9 Bloods' structure includes O.G. (original gangster and shot caller or leader); Y.G. (young
10 gangster or mid-level member); and B.G. (baby gangster or new recruit). Rival street gangs
11 of the Playboy Bloods have included GPK's, Rolling 60's, Piru Bloods, and the Donna Street
12 Crips. As such, most violent conflicts with other gangs stem from rival gang members
13 invasion of the Playboy Blood drug territory.

14 6. The Playboy Bloods have a history of violence and conflict with the
15 security officers assigned to patrol the Jets. These conflicts have resulted in murder,
16 attempted murder, and assault and battery. Security Officers are subject to almost daily
17 harassment from the Playboy Bloods members. The conflict between the Playboy Bloods
18 and the security officers arose from the security officers attempts to curtail the drug
19 trafficking trade in the Jets by trespassing all those who did not live in the Jets
20 neighborhood.

21 7. The main financial activity of the Playboy Bloods is the trafficking of
22 narcotics, primarily crack cocaine. Members of the Playboy Bloods establish "drug spots"
23 in their neighborhood where they sell crack cocaine. The drug sellers use apartments or
24 hotel rooms that are rented in the names of other people. These renters of the drug spots
25 are frequently "smokers" who are given crack cocaine or money for allowing the Playboy
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1 Bloods members to deal drugs from their apartment or hotel room. Cooperating female
2 Playboy Bloods members are often given money to pay their bills for allowing the gang
3 members to deal drugs from their residences. Playboy Bloods members use these
4 residences in other peoples name to conceal their illegal activity.

5 ROLES OF THE DEFENDANTS

6 8. The defendants participated in the operation and management of the
7 enterprise.

8 a. **DELVIN WARD, A/K/A "D-LUV"** is an O.G. of the Playboy Bloods who
9 manufactures and distributes narcotics, primarily crack cocaine. As an O.G. of the
10 enterprise, **WARD** calls "shots" or otherwise approves and directs criminal conduct by other
11 Playboy Bloods members. **WARD** also engages directly and indirectly in criminal acts of the
12 enterprise, including but not limited to acts involving murder, extortion, and robbery.

13 b. **ANTHONY MABRY, A/K/A "AK" AND "AKIM SLIM"** is an O.G. of the
14 Playboy Bloods who manufactures and distributes narcotics, primarily crack cocaine. As an
15 O.G. of the enterprise, **MABRY** calls "shots" or otherwise approves and directs criminal
16 conduct by other Playboy Bloods members. **MABRY** also engages directly and indirectly
17 in criminal acts of the enterprise, including but not limited to acts involving murder, extortion,
18 and robbery.

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20 c. **MARKETTE TILLMAN, A/K/A, "KETTY P"** is an O.G. of the Playboy
21 Bloods who manufactures and distributes narcotics, primarily crack cocaine. As an O.G.
22 member of the enterprise, **TILLMAN** calls "shots" or otherwise approves and directs criminal
23 conduct by other Playboy Bloods members. **TILLMAN** also engages directly and indirectly
24 in criminal acts of the enterprise, including but not limited to acts involving murder, extortion,
25 and robbery.

1 d. **DEMICHAELE BURKS**, A/K/A "MIKEY P" is a Y.G. of the Playboy
2 Bloods. As a Y.G. member of the enterprise, **BURKS** aids and assists O.G. members of the
3 enterprise, including **TILLMAN**, in manufacturing and distributing narcotics, primarily crack
4 cocaine, which includes operating drug houses within Playboy Bloods turf.

5 e. JACOREY TAYLOR, A/K/A "MO-B" is a Y.G. of the Playboy Bloods.
6 As a Y.G. member of the enterprise, TAYLOR engages in acts of violence, including acts
7 involving murder, and he aids and assists O.G. members of the enterprise in manufacturing
8 and distributing narcotics, including operating drug houses within the Playboy Bloods turf.
9 TAYLOR is also a member of Full Throttle Clique, a group within the Playboy Bloods that
10 commits acts of violence, including acts involving murder, for the purpose of controlling and
11 expanding the territory of the Playboy Bloods and retaliating against the enterprise's
12 enemies and rivals.

13 f. **FRED JAMES NIX, A/K/A "JUNE P"** is a Y.G. of the Playboy Bloods.
14 As a Y.G. member of the enterprise, **NIX** engages in acts of violence, including acts
15 involving murder, and he aids and assists O.G. members of the enterprise, including **WARD**,
16 in manufacturing and distributing of narcotics, primarily crack cocaine, including operating
17 drug houses within the Playboy Bloods turf.

18 g. **SEBASTIAN WIGG, A/K/A "ROCK"** is an O.G. of the Playboy Bloods
19 who manufactures and distributes narcotics, primarily crack cocaine. As an O.G. of the
20 enterprise, **WIGG** calls "shots" or otherwise approves and directs criminal conduct by other
21 Playboy Bloods' members. **WIGG** also engages directly and indirectly in criminal acts of the
22 enterprise, including but not limited to acts involving murder, extortion, and robbery.

23 h. **REGINALD DUNLAP, A/K/A "BOWLIE"** is a Y.G. of the Playboy
24 Bloods. As a Y.G. member of the enterprise, **DUNLAP** engages in acts of violence,
25 including acts involving murder, and he aids and assists O.G. members of the enterprise in

1 manufacturing and distributing of narcotics, including operating drug houses within the
2 Playboy Bloods turf. **DUNLAP** is also a member of Full Throttle Clique, a group within the
3 Playboy Bloods that commits acts of violence, including acts involving murder, for the
4 purpose of controlling and expanding the territory of the Playboy Bloods and retaliating
5 against the enterprise's enemies and rivals.

6 i. STEVEN BOOTH, A/K/A "STEVIE-P" is a Y.G. of the Playboy Bloods.
7 As a Y.G. member of the enterprise, **BOOTH** engages in acts of violence, including acts
8 involving murder, and he aids and assists O.G. members of the enterprise in manufacturing
9 and distributing of narcotics, which includes including operating drug houses within the
10 Playboy Bloods turf. **BOOTH** is also a member of Full Throttle Clique, a group within the
11 Playboy Bloods that commits acts of violence, including acts involving murder, for the
12 purpose of controlling and expanding the territory of the Playboy Bloods and retaliating
13 against the enterprise's enemies and rivals.

14 j. **TERRENCE THOMAS, A/K/A "SEVEN" AND "SEVEN A"** is an
15 associate of the Playboy Bloods who aids and assists O.G. members of the enterprise,
16 including **WARD**, in manufacturing and distributing narcotics, including operating drug
17 houses within Playboy Bloods turf.

PURPOSES OF THE ENTERPRISE

9. The purposes of the Playboy Bloods enterprise included the following:

20 A. to enrich the members and associates of the enterprise through
21 the trafficking of illegal drugs, primarily cocaine base, also known as crack cocaine;

22 B. to preserve and protect the power, territory, and profit of the
23 enterprise through the use of violence, intimidation, threats, robbery, and acts involving
24 murder:

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C. to create, maintain, and control a marketplace for the distribution of controlled substances;

D. to protect the enterprise and its members from detection, apprehension and prosecution by law enforcement;

E. to prevent, thwart, and retaliate against acts of violence perpetrated by rivals against the enterprise and its members; and

F. to promote and enhance the reputation and standing of the enterprise and its members.

MEANS AND METHODS OF THE ENTERPRISE

10. Members of the Playboy Bloods and their associates use various means and methods to conduct the affairs of the enterprise, which further their wealth and control, secure their protection and dominance, and contribute to the growth and expansion of the enterprise's criminal operations within the Las Vegas, Nevada, metropolitan area. Among the means and methods by which the defendants and their associates conduct and participate in the conduct of the affairs of the enterprise include the following:

A. Members of the enterprise and their associates have used, attempted to use, and conspired to use extortion, which affected interstate commerce.

B. Members of the enterprise and their associates have committed, attempted and threatened to commit acts of violence, including murder, robbery and extortion, to protect and to expand the enterprise's criminal operations.

C. Members of the enterprise and their associates have promoted a climate of fear through violence and threats of violence.

D. Members of the enterprise and their associates have used and threatened to use physical violence against various individuals.

E. Members of the enterprise and their associates have trafficked in crack cocaine, marijuana and guns.

THE RICO CONSPIRACY

4 11. Beginning in at least 1999, up through and including the date of this
5 Indictment, the defendants and others known and unknown to the Special Grand Jury, being
6 persons employed by and associated with the Playboy Bloods, an enterprise, which
7 engaged in, and the activities of which affected, interstate commerce, did knowingly and
8 intentionally conspire to violate Title 18, United States Code, Section 1962(c); that is, to
9 conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise
10 through a pattern of racketeering activity, as that term is defined by Title 18, United States
11 Code, Sections 1961(1) and (5). The pattern of racketeering activity through which the
12 defendants agreed to conduct the affairs of the enterprise consisted of multiple acts
13 involving murder, in violation of Nevada Revised Statutes, Sections 195.020 (aiding and
14 abetting), 199.480 (conspiracy), 200.030 (murder) and 193.330 (attempted murder);
15 extortion, in violation of Nevada Revised Statutes, Section 205.320; acts indictable under
16 Title 18, United States Code, Section 1951 (interference with commerce by robbery and
17 extortion); and offenses involving the felonious manufacturing, importation, receiving,
18 concealment, buying, selling and otherwise dealing in a controlled substance, in violation of
19 Title 21, United States Code, Sections 841, 846 and 856.

20 12. It was a part of the conspiracy that the Defendants, DELVIN WARD,
21 A/K/A "D-LUV"; ANTHONY MABRY, A/K/A "AK" AND "AKIM SLIM"; MARKETTE
22 TILLMAN, A/K/A "KETTY-P"; DEMICHAEL BURKS, A/K/A "MIKEY-P"; JACOREY
23 TAYLOR, A/K/A "MO-B"; FRED JAMES NIX, A/K/A "JUNE-P"; SEBASTIAN WIGG, A/K/A
24 "ROCK"; REGINALD DUNLAP, A/K/A "BOWLIE"; STEVEN BOOTH, A/K/A "STEVIE-P";
25 and TERRENCE THOMAS, A/K/A "SEVEN" AND "SEVEN-A"; and others known and

1 unknown to the Special Grand Jury, agreed that at least two acts of racketeering activity
2 would be committed by a member of the conspiracy in the conduct of the affairs of the
3 enterprise.

4 ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION
5 1962(d).

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5 **COUNT NINE**
6 DRUG CONSPIRACY
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Beginning at an unknown time in on or about 1998, up through and including
the date of this Indictment, the Defendants, **DELVIN WARD, A/K/A "D-LUV"; ANTHONY
MABRY, A/K/A "AK" AND "AKIM SLIM"; MARKETTE TILLMAN, A/K/A "KETTY-P";
DEMICHAEAL BURKS, A/K/A "MIKEY-P"; JACOREY TAYLOR, A/K/A "MO-B"; FRED
JAMES NIX, A/K/A "JUNE P"; SEBASTIAN WIGG, A/K/A "ROCK"; REGINALD DUNLAP,
A/K/A "BOWLIE"; STEVEN BOOTH, A/K/A "STEVIE-P"; TERRENCE THOMAS, A/K/A
"SEVEN" AND "SEVEN-A"; and others known and unknown to the Special Grand Jury, did
knowingly and intentionally conspire to distribute 50 grams or more of a mixture and
substance containing a detectable amount of cocaine base, also known as "rock" and "crack
cocaine."**

ALL IN VIOLATION OF TITLE 21, UNITED STATES CODE, SECTION 846.

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COUNT TWENTY-TWO

POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE

On or about November 1, 2006, the defendants, **DELVIN WARD, A/K/A "D-LUV"** and **TERRENCE THOMAS, A/K/A "SEVEN" AND "SEVEN-A,"** did knowingly and intentionally distribute 5 or more grams of a mixture and substance containing a detectible amount of cocaine base, a controlled substance.

1 ALL IN VIOLATION OF TITLE 21, UNITED STATES CODE, SECTION
2 841(a)(1) & (b)(1)(B)(iii), AND TITLE 18, UNITED STATES CODE, SECTION 2.
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12 **COUNT TWENTY-FOUR**
13 POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE
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15 On or about November 10, 2006, the defendant, **TERRENCE THOMAS, A/K/A**
16 **“SEVEN” AND “SEVEN-A,”** did knowingly and intentionally distribute 5 or more grams of
17 a mixture and substance containing a detectible amount of cocaine base, a controlled
18 substance.

19 ALL IN VIOLATION OF TITLE 21, UNITED STATES CODE, SECTION
20 841(a)(1) & (b)(1)(B)(iii), AND TITLE 18, UNITED STATES CODE, SECTION 2.
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4 **COUNT THIRTY-TWO**

5 POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE

6 On or about December 13, 2006, the defendant, **TERRENCE THOMAS,**
7 **A/K/A "SEVEN" AND "SEVEN-A,"** did knowingly and intentionally distribute 5 or more
8 grams of a mixture and substance containing a detectable amount of cocaine base, a
9 controlled substance.

10 ALL IN VIOLATION OF TITLE 21, UNITED STATES CODE, SECTION
11 841(a)(1) & (b)(1)(B)(iii), AND TITLE 18, UNITED STATES CODE, SECTION 2.

12
13 DATED: this the 28 day of October 2008.

14 **A TRUE BILL:**

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16
17 /s/
18 FOREPERSON OF THE GRAND JURY

19 GREGORY A. BROWER
20 United States Attorney
ERIC JOHNSON
21 Chief, Organized Crime Strike Force

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24 KATHLEEN BLISS
25 Assistant United States Attorney
Organized Crime Strike Force

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